

(12)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 07-09-GMS
	:	
CLAVEN ANDERSON	:	
	:	
Defendant.	:	

MOTION TO EXTEND TIME TO FILE PRE-TRIAL MOTIONS

Defendant Claven Anderson, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an Order enlarging the time within which pre-trial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions in this case are due by March 9, 2007.
2. On March 6, 2007, defense counsel and counsel for the government were made aware for the first time that the defendant was interviewed by law enforcement officers in regard to this case and that the defendant made a statement. The case agent for this case is in the process of preparing a report regarding the interview of the defendant. Defense counsel requires time to review the statement allegedly made by the defendant and to discuss factors relating to the statement and to the taking of the statement with the defendant before it can be determined what, if any, pre-trial motions need to be filed in this case.
3. The defendant respectfully requests an extension of time of one month in which to file any pre-trial motions to allow defense counsel adequate time to review the defendant's alleged

statement with the defendant once it is received from the government.

4. AUSA Sophie Bryan, counsel for the government, has no objection to this motion for an extension of time in which to file pre-trial motions.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended until anytime after April 10, 2007.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Eleni Kousoulis". The signature is written in dark ink and is positioned above a horizontal line.

Eleni Kousoulis, Esquire
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
(302) 573-6010
Attorney for Defendant Claven Anderson

Dated: March 9, 2007

CERTIFICATE OF SERVICE

Undersigned counsel certifies that two copies of Defendant's Motion to Extend Time to File Pretrial Motions were hand delivered on March 9, 2007, to a box designated for the U.S. Attorney's Office located in the U.S. District Court Clerk's Office addressed to:

Sophie Bryan, Esquire
U.S. Attorney's Office
The Nemours Building
1007 Orange Street, Suite 700
Wilmington, DE 19801



Eleni Kousoulis, Esquire
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Attorney for Defendant Claven Anderson

DATED: March 9, 2007